

# The Dickerson Law Group

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December 29, 2023

**VIA CM/ECF AND EMAIL**

*Original will not follow by mail.*

The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: In re Search Warrants dated November 3, 2021, 21 MAG 10547**  
**Miscellaneous Case No. 21-mc-00825**

Dear Judge Torres:

I represent Petitioner, Spencer Meads (“Petitioner”) in the above-referenced action.

As Your Honor is aware, the Court’s December 21, 2023 Order [Dkt. 68] states, in relevant part: “By **January 5, 2024**, the Government’s filter team shall turn over the Responsive Materials which are not protected by the attorney-client privilege to the Government’s investigation team.” Order at p. 23 (emphasis in original). The Order was not served on the undersigned by the CM/ECF system until Friday, December 22, 2023 at 3:29 p.m. EST.

Petitioner hereby requests that the Court impose an administrative stay of the Court’s Order for seven (7) days, or otherwise modify the Order to provide that the Government’s filter team shall not turn over any materials to the investigative team before January 6, 2024, to allow Petitioner the time necessary to (a) determine whether Petitioner will appeal the Order, and (b) prepare and file an appropriate motion to stay the Court’s Order. As grounds for the instant request, due to the entry of the Court’s Order shortly before the Christmas holiday, the undersigned was not able to speak via phone with Petitioner regarding his appeal rights and options moving forward until the afternoon of Wednesday, December 27, 2023. Petitioner is currently weighing his options and requires a brief period of time to determine how he intends to proceed. Although our office is generally closed during the period between Christmas and the new year, we are working with Petitioner to determine how he will proceed and to prepare any necessary filings.

As the Court’s Order provides no mechanism to prevent the Government’s filter team from immediately turning over the Responsive Materials to the Government’s investigative team that are not protected by the attorney-client privilege, Petitioner will be severely prejudiced in the event that any materials are turned over and reviewed by the Government’s investigative team members before the undersigned has sufficient time to even file a notice of appeal and brief any stay request with the

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Court. In this regard, to the extent that materials already have been turned over to the Government's investigative team, we request an order precluding the Government's investigative team members from reviewing any materials until further order of the Court.

Notably, the Government will not be prejudiced by the brief administrative stay requested herein, given that it is unlikely that this matter would be given significant attention by the Government's investigative team members over the holidays. The Government otherwise will suffer no prejudice by a one-week administrative stay of the Court's Order or modification of the Court's Order as requested above.

By copy of this correspondence to AUSAs Robert B. Sobelman, Mitzi Steiner, and Jacqueline Kelly, I hereby request that the Government update the Court regarding whether the Government's filter team has turned over any Responsive Materials to the Government's investigative team and, if so, what if any advance instructions the Government has given to the investigative team members in light of Petitioner's request herein.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,



By: \_\_\_\_\_

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